

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE  
COMMISSION

Plaintiff,

v.

JB I, INC.,  
JOHN W. BORDYNUIK, and  
RONALD BALDWIN, JR.,

Defendants.

Civil Action No. 1:12-cv-10012-MLW

**DEFENDANTS' ASSENTED-TO MOTION FOR  
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendants JBI, Inc. ("JBI"), John W. Bordynuik, and Ronald Baldwin, Jr., with the assent of Plaintiff Securities and Exchange Commission ("SEC"), respectfully request that the Court extend the deadline for JBI and Baldwin to answer, move, or otherwise respond to the Complaint until April 5, 2012. In support of this Motion, Defendants state as follows:

1. On January 4, 2012, the SEC filed the Complaint in this action.
2. On January 5, 2012, the SEC sent Defendants requests for waivers of service pursuant to Fed. R. Civ. P. 4(d). All Defendants agreed to waive service of process.
3. Pursuant to Fed. R. Civ. P. 12(a)(1)(A)(ii), JBI's and Baldwin's responsive pleading is due on March 5, 2012, "60 days after the request for waiver is sent." Because Bordynuik resides in Canada, the deadline for him to file a responsive pleading is April 5, 2012.
4. So that the Defendants may continue to engage in settlement discussions with the SEC (which began before the commencement of this litigation), and so that the pleading dates

for all Defendants remain on the same schedule, JBI and Baldwin request that the Court extend the time for them to file a responsive pleading until April 5, 2012.

5. The SEC assents to this Motion.

WHEREFORE, the Court should allow Defendants' request for an extension of time until April 5, 2012 for JBI and Baldwin to answer, move, or otherwise respond to the Amended Complaint.

Dated: February 1, 2012

Respectfully Submitted,

JB, INC., JOHN W. BORDYNUK, and  
RONALD BALDWIN, JR.,

By their attorneys:

/s/ Juan Marcel Marcelino  
Juan Marcel Marcelino, BBO# 318810  
GREENBERG TRAURIG, LLP  
One International Place  
Boston, Massachusetts 02110  
Tel: (617) 310-6000  
Fax: (617) 310-6001  
marcelinoj@gtlaw.com

**LOCAL RULE 7.1(A)(2) CERTIFICATE**

I, Juan Marcel Marcelino, hereby certify that I conferred with counsel for the SEC, who ASSENTS to this motion.

/s/ Juan Marcel Marcelino

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent via U.S. first class mail to those indicated as non-registered participants on February 1, 2012.

/s/ Juan Marcel Marcelino